

**Federal Defenders
OF NEW YORK, INC.**

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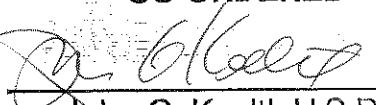
Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

November 14, 2021

VIA ECF

The Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

**APPLICATION GRANTED
SO ORDERED**


John G. Koeltl, U.S.D.J.

11/15/21

RE: United States v. Pimental
21 Cr 451 (JGK)

Dear Judge Koeltl:

The defense writes to respectfully request modification of Ms. Pimentel's bail conditions. The defense requests that Ms. Pimentel be permitted to reside with her cousin in Lawrence, Massachusetts, and be supervised in the District of Massachusetts. Pretrial services and the Government have no objection to this request.

Ms. Pimentel was granted bail by Judge Rakoff sitting in Part I on August 17, 2021. Her conditions include: a \$100,000 bond co-signed by two financially responsible people, she must reside with her aunt in Mount Vernon, NY, pretrial supervision as directed by Pretrial Services, home detention enforced by electronic monitoring, receiving a COVID-19 vaccination, and the other standard conditions of release. On September 20, 2021, your Honor removed the condition of home detention and substituted it with curfew to be enforced by electronic monitoring. Since her release from the MDC and transition to curfew, Ms. Pimentel has been fully compliant with all conditions of her release.

The defense makes this request so Ms. Pimentel may live with her cousin, Maximo Lopez. This is the most supportive environment for Ms. Pimentel, as she has immediate family in Lawrence who can help her find and maintain employment. Pretrial and the Government both do not object to this modification.

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Respectfully submitted,

IAM

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cc: Kevin Mead, Esq.
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